

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

**ASHLEY MOREAUX AND CHRIS
MOREAUX**

NO. 2:18-CV-1255

v.

JUDGE CAIN

**CLEAR BLUE INSURANCE
COMPANY, TIM ABLES TRUCKING
COMPANY, LLC, SHANNON
WATSON AND KEVIN POSEY**

MAGISTRATE JUDGE KAY

**DAUBERT/FORET MOTION
TO EXCLUDE OR LIMIT THE TESTIMONY OF DR. HUMA HAIDER,
PLAINTIFF'S "TRAUMATIC BRAIN INJURY" EXPERT**

MAY IT PLEASE THE COURT:

Plaintiff, Ashley Moreaux, intends to call Dr. Huma Haider, the principal and owner of National Brain Injury Institute, a Professional Limited Liability Company, in Houston, Texas, as a "traumatic brain injury" specialist. Defendants move this court to exclude Dr. Haider from testifying, due to her lack of expertise to opine on the subjects on which she purports to offer opinions, or alternatively to prevent Plaintiff or any witness from referring to or characterizing Dr. Haider as a "traumatic brain injury" specialist, for the reasons set forth more fully in the attached memorandum in support and exhibits.

WHEREFORE, Defendants pray that this Honorable Court will enter an Order excluding Dr. Huma Haider from testifying at trial of this matter or alternatively limiting her and preventing her or Plaintiff from referring to Dr. Haider as a "traumatic brain injury" specialist.

Respectfully submitted,

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-AND-

Certificate of Service

I HEREBY CERTIFY that on the **8th day of March, 2021**, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

s/Paul J. Verlander

Paul J. Verlander

/s/ Paul Verlander

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